

UCRSF  
21-3  
3/14/08

**teckcominco**

## **PROGRESS REPORT NO. 20**

**TO:** Kevin Rochlin – U.S. Environmental Protection Agency (EPA), Region 10  
(R10) - via Email  
Monica Tonel – EPA, R10 (via Email)

**FROM:** Marko Adzic – Teck Cominco American Incorporated (TCAI)

**CC:** David Godlewski – TCAI (via Email)  
Bruce Duncan – EPA, R10 (via Email)  
David Charters – EPA, Headquarters (via Email)  
Lucinda Jacobs – Integral Consulting Inc. (via Email)

**DATE:** March 14, 2008

**FILE NO:** 1-773180-000

**RE:** Upper Columbia River (UCR) Remedial Investigation/Feasibility Study  
(RI/FS) - Progress Report No. 20 Month Ending February 2008

---

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of the activities completed during the past month in compliance with the aforementioned Agreement. It is also intended to provide a brief summary of pending and on-going activities.

TCAI continues to develop and when complete submit key elements for the RI/FS and upcoming field sampling season. A copy of the draft Screening Level Ecological Risk Assessment (SLERA) was posted on the secure domain of the project website (<https://www.ucr-rifs.com>) on March 11, 2008 for review and comment. As discussed and requested during a March 6, 2008 telephone conversation, a hard copy and one compact disc (CD) will be made available to respective project managers<sup>1</sup> prior to the March 2008 technical workshop<sup>2</sup> in Seattle, Washington (WA). We wish to confirm that hard copies and associated CDs will also be made available to identified technical reviewers (i.e., the document distribution list) in the very near future.

TCAI is presently finalizing the draft surface water sampling and analysis plan (SAP) and intends to provide an electronic copy of the draft SAP for review and comment prior to

---

<sup>1</sup> Respective project managers include: Kevin Rochlin of the U.S. Environmental Protection Agency, Dan Audet of the U.S. Department of Interior, John Roland of the State of Washington Department of Ecology, Patti Bailey of the Confederated tribes of the Colville Reservation, and Randall Connolly of the Spokane Tribe of Indians.

<sup>2</sup> A copy of the draft agenda for the March 2008 technical workshop was distributed to EPA and participating parties on March 11, 2008.

Teck Cominco American Incorporated  
PO Box 3087, Spokane, WA 99220  
Telephone: (509) 747-6111 □ Facsimile: (509) 922-8767

USEPA SF



1297833

the March 2008 technical workshop. Given the limited availability of time until the aforementioned technical workshop, it is unlikely that hard copies and associated CDs will be distributed to respective project managers prior to the workshop. However, and as with all technical deliverables, an electronic version in portable document format (pdf) will be made available on the secure domain of the project website.

Additional SAPs to be discussed during the March 2008 technical workshop and in preparation include the following: beach sediment, white sturgeon toxicity, and fish tissue. Based on discussions during the March 6, 2008 EPA/TCAI project managers call, additional beaches (spatially distributed along the length of the system), will be required and will be provided by EPA for inclusion into the draft beach sediment SAP. We await notification of the beaches before finalizing the Beach SAP. Due to inclusion of the additional beaches there is an insufficient period of time for the review of cultural resources prior to the sampling window (i.e., first week of May 2008). As a result, it is unlikely that beach sampling will occur as initiated planned. However, once the beach sediment SAP has been finalized and approved, there may be an opportunity to collect samples at a later period of time during the upcoming field sampling season.

A draft SAP for white sturgeon toxicity testing is anticipated to be made available for review and comment in the first part of April 2008. During the March 2008 technical workshop, TCAI will present a detailed summary of the study design and associated rationale.

A meeting was held at the TCAI office in Spokane, WA on Friday, February 29, 2008 with the purpose of discussing data needs for the recreational use survey. The October 22, 2007 proposal prepared by Industrial Economics, Incorporated (IEC) and the December 3, 2007 proposal prepared by TCAI were discussed; as well as a September 12, 2007 memorandum prepared for EPA by the Syracuse Research Corporation (SRC)<sup>3</sup>. There was general agreement among attendees that every effort should be made to initiate the recreational survey this year with a proposed target date of Memorial Day weekend. As a result, TCAI and EPA will need to work together in the very near future to ensure that the survey is appropriately designed for the purposes of the RI/FS.

A summary of activities (e.g., deliverables) completed to date, and those anticipated within in the near future, are presented within Table 1 below.

---

<sup>3</sup> A copy of the SRC memorandum was distributed to TCAI on February 28, 2008 and summarized specific survey data needs.

**Table 1. Upper Columbia River Remedial Investigation/Feasibility Study Summary of On-Going and Planned Activities**

Task No.	Task Description	Status	Issues	Estimated Completion Date <sup>1</sup>
1.	2005 Field Data Transfer	Complete	None to report at this time	<u>July 31, 2006</u>
2.	Technical Memorandum <sup>2</sup>	Complete	None to report at this time	<u>October 27, 2006</u>
3.	Draft RI/FS Work Plan	Complete	None to report at this time	<u>December 28, 2006</u>
4.	Sampling and Analysis Plan (SAP) <sup>3</sup>	Complete	None to report at this time	<u>February 26, 2007</u>
5.	Health and Safety Plan	Complete	None to report at this time	<u>February 26, 2007</u>
6.	Cultural Resources Coordination Plan	Complete	None to report at this time <sup>4</sup>	<u>February 26, 2007</u>
7.	Revised RMAO Memorandum <sup>5</sup>	Complete	None to report at this time	<u>March 11, 2007</u>
8.	Additional Trail Data	Complete	None to report at this time	<u>May 6, 2007</u> <sup>6</sup>
9.	April Workshop Summary	Complete	None to report at this time	<u>July 12, 2007</u>
10.	Revised RI/FS Work Plan	Complete	None to report at this time <sup>7</sup>	<u>September 21, 2007</u>
11.	Screening Level ERA	Complete	None to report at this time	<u>March 11, 2008</u>
12.	Surface Water SAP	On-Going	None to report at this time	March 2008
13.	Phase 2 Beach SAP	On-Going	Additional beaches for consideration and/or inclusion are being evaluated	TBD <sup>8</sup>
14.	White Sturgeon Surface Water Toxicity SAP	On-Going	None to report at this time	April 2008

- Notes:
1. Dates that have been underlined represent the actual day that the respective deliverable was submitted to EPA as per Paragraph 80 of the Agreement.
  2. As outlined within the Agreement, the technical memorandum outlines and described the Risk-Based Remedial Objectives for the Ecological Risk Assessment. Remedial objectives for the protection of human health will be prepared by EPA and submitted under separate cover at a later date.
  3. The Sampling and Analysis Plan (SAP) submitted in fulfillment of Paragraph 13 of the Agreement was the 2007 *Sediment Investigation of Beaches and Depositional Areas*.
  4. TCAI has been informed that revisions to the draft cultural resource coordination plan will be required. However, no specific revisions and/or requests have been identified or requested and as such, no edits can be made at this time.
  5. The draft technical memorandum on risk-based management action objectives (RMAOs) was revised per EPA's January 16, 2007 comments.
  6. Following a request outlined by EPA in a letter dated February 1, 2007 (received on February 5, 2007) TCAI has compiled additional information on the Trail Facility so as to assist in the identification of chemicals of concern (COIs) as outlined within Paragraph 24 of the Agreement. An electronic version of the deliverable was forwarded to EPA on May 6, 2007 with hard copies delivered shortly thereafter. In addition, a second deliverable identified as "Business Confidential" information was submitted to EPA legal counsel under separate cover on May 7, 2007 by Pillsbury Winthrop Shaw Pittman (i.e., TCAI legal counsel) on behalf of TCAI.
  7. At the time of writing, it remains uncertain as to when the RI/FS work plan will be approved.

Notes continued:

- 8. ERA = Ecological Risk Assessment  
SAP = Sampling & Analysis  
TBD = To be determined.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-892-2585.